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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: BLACKHAWK NETWORK DATA  
BREACH LITIGATION

Case No. 3:22-cv-07084-CRB

This Document Relates to All Cases

**DECLARATION OF OMEIKIEA  
LORENZANO OF ANGEION GROUP, LLC  
RE: NOTICE & ADMINISTRATION**

I, Omeikiea Lorenzano declare:

1. I am an Associate Project Manager at the class action notice and settlement administration firm Angeion Group, LLC (“Angeion”), whose headquarters are located at 1650 Arch Street, Suite 2210, Philadelphia, PA 19103. I am over 21 years of age and am not party to this action. I have personal knowledge of the facts set forth herein.

2. Angeion was retained by the Parties and appointed by this Court to serve as Settlement Administrator to, among other tasks, sending the Class Notice to Settlement Class members; respond to Settlement Class member inquiries; receive and process Settlement Class member claims, requests for exclusion, and objections; and perform other duties as specified in the Class Action Settlement Agreement and Release (“Settlement Agreement”) (Dkt. No. 44-1), and the Order Granting Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement (“Order”) (Dkt. No. 48).

**CAFA NOTICE**

3. On November 13, 2023, pursuant to 28 U.S.C. § 1715, Angeion, on behalf of Defendant, caused notice regarding the settlement to be sent to the Attorneys General of all U.S. states and territories, as well as the Attorney General of the United States (“CAFA Notice”). The CAFA Notice was in the same form as **Exhibit A** attached hereto.

**CLASS LIST**

4. On or about January 2, 2024, Angeion received from the Defendant a spreadsheet containing the names, last known mailing addresses, and where available, email addresses for Settlement Class members. Angeion reviewed and analyzed the data, identifying 162,115 unique Settlement Class member records<sup>1</sup>, of which 143,531 records had a valid email address.

**EMAIL NOTICE**

5. On January 12, 2024, Angeion caused the Class Notice to be sent via email to the 143,531 Settlement Class member records with a valid email address. The email notice campaign resulted in 141,818 emails delivered and 1,713 emails that were not delivered due to a hard bounce. A true and accurate copy of the Class Notice is attached hereto as **Exhibit B**.

6. With the Parties' approval, on February 27, 2024, Angeion caused the Class Notice to be emailed to an additional 6,342 records where the same email address was associated with multiple different Settlement Class member names. To account for the multiple names associated with the same email address, the Parties authorized minor revisions<sup>2</sup> to the Class Notice.

**MAILED NOTICE**

7. Prior to mailing, Angeion processed the mailing addresses of 11,763 records, which did not successfully receive the Class Notice via email, through the United States Postal Service ("USPS") National Change of Address ("NCOA") database to identify updated address information for individuals and businesses who have moved in the last four years and filed a change of address card with the USPS. The NCOA results provided 1,212 updated addresses for the Settlement Class members. Angeion updated the Class List with these updated addresses.

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<sup>1</sup> There were 6,342 records where multiple class members names were associated with the same valid email address. Angeion was working with the Parties on how to best notice these individuals.

<sup>2</sup> The revisions included: (1) Changing "You may be eligible for cash payment from a class action settlement involving Blackhawk Network, Inc. but you need to act." to "You or an individual for whom you purchased a prepaid card may be eligible for cash payment from a class action settlement involving Blackhawk Network, Inc. but you need to act." (2) Inserting: "If you purchased a prepaid card on behalf of one or more individuals, please forward this Notice to them."



1 download. True and accurate copies of the Long Form Notice and Claim Form are attached hereto  
2 as **Exhibits D** and **E**, respectively.

3 14. As of March 20, 2024, the Settlement Website has had 36,539 unique visitors,  
4 resulting in approximately 114,434 page views.

5 **TOLL-FREE HOTLINE**

6 15. On January 12, 2024, Angeion established a toll-free hotline dedicated to this  
7 Settlement: 1-866-557-1237. The toll-free hotline utilizes an interactive voice response (“IVR”)  
8 system to provide Settlement Class members with responses to frequently asked questions and  
9 provide essential information regarding the Settlement. Settlement Class members may also leave a  
10 message to ask additional questions, provide updated address information or request a notice to be  
11 mailed to them. This hotline is accessible 24 hours a day, 7 days a week.

12 16. As of March 20, 2024, the toll-free line has received 1,568 calls, of which 429 were  
13 connected to the live operator.

14 **CLAIM FORMS**

15 17. The deadline for Settlement Class members to submit a Claim Form is April 11, 2024.  
16 As of March 20, 2024, Angeion has received 17,964 Claim Forms (17,669 via the online portal and  
17 295 via mail). Angeion will continue to keep the Parties apprised of the number Claim Form  
18 submissions it receives through the April 11, 2024 deadline.

19 **REQUESTS FOR EXCLUSION AND OBJECTIONS**

20 18. The deadline for Settlement Class members to request exclusion from the Settlement  
21 was March 14, 2024. As of March 20, 2024, Angeion has received three (3) requests for exclusion.  
22 A table summarizing the exclusions received is attached hereto as **Exhibit F**.

23 19. The deadline for Settlement Class members to object to the Settlement was March  
24 14, 2024. As of March 20, 2024, Angeion has not received any objection to the Settlement.

25 20. Angeion will keep the Parties apprised of any additional requests for exclusion and/or  
26 objections received.

**NOTICE & ADMINISTRATION COSTS**

21. The total notice and administration costs incurred through February 29, 2024, are \$58,217.34. Angeion estimates that it will incur approximately \$46,260 in additional costs through the remainder of the administration.<sup>3</sup>

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on March 20, 2024, in Clayton, Delaware.

/s/ Omeikia Lorenzano

Omeikia Lorenzano

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<sup>3</sup> This estimate is subject to change based on the number of additional Claim Forms received through the April 11, 2024 deadline, and subsequent related costs such as documentation review, deficiency processing, and the issuance of payments via the method of payment selected by Settlement Class members.

## **EXHIBIT A**



1650 Arch Street, Suite 2210  
Philadelphia, PA 19103  
www.angeiongroup.com  
215.563.4116 (P)  
215.525.0209 (F)

November 13, 2023

VIA USPS PRIORITY MAIL

United States Attorney General &  
Appropriate Officials

**Re: Notice of Class Action Settlement**  
*Blackhawk Network Data Breach Litigation*, No. 3:22-cv-07084-CRB

Dear Counsel or Official:

Angeion Group, an independent claims administrator, on behalf of the defendant in the below-described action, hereby provides your office with this notice under the provisions of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, to advise you of the following proposed class action settlement:

**Case Name:** *Blackhawk Network Data Breach Litigation*  
**Index Number:** 3:22-cv-07084-CRB  
**Jurisdiction:** United States District Court, Northern District of California, San Francisco Division  
**Date Settlement Filed with Court:** November 3, 2023

In accordance with the requirements of 28 U.S.C. § 1715, copies of the following documents associated with this action are available at <https://www.angeiongroup.com/cafa/>.

1. **28 U.S.C. § 1715(b)(1)-Complaint:** *Class Action Complaint* filed with the Court on November 11, 2022; *Amended Consolidated Class Action Complaint* filed with the Court on February 9, 2023.
2. **28 U.S.C. § 1715(b)(2)-Notice of Any Scheduled Judicial Hearings:** Per Dkt. No. 45, the Settlement Motion for Preliminary Approval of Class Action Settlement Hearing is currently scheduled for December 15, 2023 at 10:00 am via a Zoom webinar before Judge Charles R. Breyer.
3. **28 U.S.C. § 1715(b)(3)-Notification to Class Members:** *Email Notice*, *Postcard Notice*, *Long Form Notice*, *Online Claim Form*, and *Paper Claim Form*, filed with the Court on November 3, 2023. The proposed settlement administration protocol and notice plan, filed on November 3, 2023, is also available at <https://www.angeiongroup.com/cafa/>.
4. **28 U.S.C. § 1715(b)(4)-Class Action Settlement Agreement:** *Settlement Agreement and Release*, filed with the Court on November 3, 2023. *Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement and Supporting Memorandum*, filed with the Court on November 3, 2023, is also available at <https://www.angeiongroup.com/cafa/>.

5. **28 U.S.C. § 1715(b)(5)-Any Settlement or Other Agreements:** Other than the Settlement Agreement, no other settlements or other agreements have been contemporaneously made between the Parties.
6. **28 U.S.C. § 1715(b)(6)-Final Judgment:** The Court has not issued a Final Judgment or notice of dismissal as of the date of this CAFA Notice.
7. **28 U.S.C. § 1715(b)(7)(B)-Estimate of Class Members:** The Settlement Class contains approximately 165,727 Class Members located throughout the United States. The estimated proportional share of the Settlement benefits is not available at this time, as it is contingent on the Class Members' submission of a claim form.
8. **28 U.S.C. §1715(b)(8)-Judicial Opinions Related to the Settlement:** The Court has not issued a judicial opinion related to the Settlement at this time. The *[Proposed] Order Granting Unopposed Motion for Preliminary Approval of Class Settlement Agreement* is available at <https://www.angeiongroup.com/cafa/>.

If you have questions or concerns about this notice, the proposed settlement, or difficulty accessing the associated documents, please contact this office.

Sincerely,

Angeion Group  
1650 Arch Street, Suite 2210  
Philadelphia, PA 19103  
(p) 215-563-4116  
(f) 215-563-8839



## **EXHIBIT B**

**Sender Email:** [info@PrepaidCardDataBreachSettlement.com](mailto:info@PrepaidCardDataBreachSettlement.com)

**Sender Name:** Blackhawk Network Data Breach Settlement Administrator

**Subject Line:** Notice of Class Action Settlement – In re: Blackhawk Network Data Breach Litigation

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Notice ID:

Confirmation Code:

**NOTICE OF CLASS ACTION SETTLEMENT**

You may be eligible for cash payment from a class action settlement involving Blackhawk Network, Inc. but you need to act.

*Si desea recibir esta notificación en español, llámenos o visite nuestra página web.*

**A court authorized this Notice.**

This is not spam, an advertisement, or a lawyer solicitation.

A settlement has been reached in a class action lawsuit against Blackhawk Network, Inc. d/b/a Blackhawk Engagement Solutions (“Blackhawk”) that alleges that Blackhawk was negligent and breached contractual and statutory duties in connection with a Data Security Incident on MyPrepaidCenter.com that Blackhawk disclosed in October 2022. Blackhawk denies all of the claims and says it did not do anything wrong.

This notice summarizes the proposed settlement. For the precise terms of the settlement, please see the settlement agreement available at [www.PrepaidCardDataBreachSettlement.com](http://www.PrepaidCardDataBreachSettlement.com), by contacting class counsel at Clayeo C. Arnold, APC, 865 Howe Avenue, Sacramento, CA 95825, by accessing the Court docket in this case, for a fee, through the Court’s Public Access to Court Electronic Records (PACER) system at <https://ecf.cand.uscourts.gov>, or by visiting the office of the Clerk of the Court for the United States District Court for the Northern District of California, 450 Golden Gate Avenue, San Francisco, CA 94102, between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays.

PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK’S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.

**ARE YOU INCLUDED?** Yes, Blackhawk’s records show that you are an individual whose information was accessed and that you were sent a notification of the Data Security Incident on or about October 31, 2022. Therefore, you are included in this Settlement as a “Settlement Class member.”

**WHAT ARE THE SETTLEMENT BENEFITS?** Blackhawk has agreed to establish a Settlement Fund of \$985,000. Settlement Class Members who submit a valid claim will be reimbursed for any valid Out-of-Pocket losses fairly traceable to the Data Security Incident up to \$5,000 and will receive a *pro-rata* distribution. Additionally, California Settlement Subclass Members who submit a valid claim will receive \$200 in compensation for their statutory claims available under California law. All attorneys’ fees and costs will also be paid from the Settlement Fund.

**HOW CAN I FILE A CLAIM?** The only way to file a claim is by filling out a Claim Form available if you:

- Visit the settlement website at [www.PrepaidCardDataBreachSettlement.com](http://www.PrepaidCardDataBreachSettlement.com) or
- Call 1-866-557-1237.

All claims must be filed *before* **April 11, 2024**.

**WHAT ARE MY OTHER OPTIONS?** If you do nothing, you will remain in the Class, you will not be eligible for benefits, and you will be bound by the decisions of the Court and give up your rights to sue Blackhawk for the claims resolved by this Settlement. If you do not want to be legally bound by the Settlement, you must exclude yourself by **March 14, 2024**. If you stay in the Settlement, you may object to it by **March 14, 2024**. A more detailed notice is available to explain how to exclude yourself or object. Please visit the settlement website below or call the phone number below for a copy of the more detailed notice.

**WHEN WILL THE COURT DECIDE WHETHER TO APPROVE THE SETTLEMENT?** On **May 17, 2024** the Court will hold a Final Approval Hearing to determine whether to approve the Settlement, Class Counsel's request for attorneys' fees, costs, and expenses of \$985,000.00 and a service award of \$2,500 for each Plaintiff. The Motion for attorneys' fees will be posted on the settlement website after it is filed. You or your own lawyer may ask to appear and speak at the hearing at your own cost, but you do not have to.

For more information, call or visit the website below.

[www.PrepaidCardDataBreachSettlement.com](http://www.PrepaidCardDataBreachSettlement.com)

1-866-557-1237

[Unsubscribe](#)

## **EXHIBIT C**

**You may be eligible for  
cash payment from a  
class action settlement  
involving  
Blackhawk Network, Inc.  
but you need to act.**

Si desea recibir esta  
notificación en español,  
llámenos o visite nuestra  
página web.

**A court authorized this  
Notice.**

This is not spam, an  
advertisement, or a lawyer  
solicitation.

PLEASE DO NOT TELEPHONE  
THE COURT OR THE COURT  
CLERK'S OFFICE TO INQUIRE  
ABOUT THIS SETTLEMENT OR  
THE CLAIM PROCESS.

Blackhawk Data Breach Settlement  
c/o Settlement Administrator  
1650 Arch Street, Suite 2210  
Philadelphia, PA 19103

«ScanString»

Postal Service: Please do not mark barcode

Notice ID: «Notice ID»  
Confirmation Code: «Confirmation Code»  
«FirstName» «LastName»  
«Address1»  
«Address2»  
«City», «StateCd» «Zip»  
«CountryCd»

A settlement has been reached in a class action lawsuit against Blackhawk Network, Inc. d/b/a Blackhawk Engagement Solutions ("Blackhawk") that alleges that Blackhawk was negligent and breached contractual and statutory duties in connection with a Data Security Incident on MyPrepaidCenter.com that Blackhawk disclosed in October 2022. Blackhawk denies all of the claims and says it did not do anything wrong.

This notice summarizes the proposed settlement. For the precise terms of the settlement, please see the settlement agreement available at **www.PrepaidCardDataBreachSettlement.com**, by contacting class counsel at Clayeo C. Arnold, APC, 865 Howe Avenue, Sacramento, CA 95825, by accessing the Court docket in this case, for a fee, through the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.cand.uscourts.gov>, or by visiting the office of the Clerk of the Court for the United States District Court for the Northern District of California, 450 Golden Gate Avenue, San Francisco, CA 94102 between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays.

**ARE YOU INCLUDED?** Yes, Blackhawk's records show that you are an individual whose information was accessed and that you were sent a notification of the Data Security Incident on or about October 31, 2022. Therefore, you are included in this Settlement as a "Settlement Class member."

**WHAT ARE THE SETTLEMENT BENEFITS?** Blackhawk has agreed to establish a Settlement Fund of \$985,000. Settlement Class Members who submit a valid claim will be reimbursed for any valid Out-of-Pocket losses fairly traceable to the Data Security Incident up to \$5,000 and will receive a *pro-rata* distribution. Additionally, California Settlement Subclass Members who submit a valid claim will receive \$200 in compensation for their statutory claims available under California law. All attorneys' fees and costs will also be paid from the Settlement Fund.

**HOW CAN I FILE A CLAIM?** The only way to file a claim is by filling out a Claim Form available if you: Visit the settlement website at **www.PrepaidCardDataBreachSettlement.com** or Call 1-866-557-1237. All claims must be filed *before April 11, 2024*.

**WHAT ARE MY OTHER OPTIONS?** If you do nothing, you will remain in the Class, you will not be eligible for benefits, and you will be bound by the decisions of the Court and give up your rights to sue Blackhawk for the claims resolved by this Settlement. If you do not want to be legally bound by the Settlement, you must exclude yourself by **March 14, 2024**. If you stay in the Settlement, you may object to it by **March 14, 2024**. A more detailed notice is available to explain how to exclude yourself or object. Please visit the settlement website below or call the phone number below for a copy of the more detailed notice.

**WHEN WILL THE COURT DECIDE WHETHER TO APPROVE THE SETTLEMENT?** On **May 17, 2024** the Court will hold a Final Approval Hearing to determine whether to approve the Settlement, Class Counsel's request for attorneys' fees, costs, and expenses of \$985,000.00 and a service award of \$2,500.00 for each Plaintiff. The Motion for attorneys' fees will be posted on the settlement website after it is filed. You or your own lawyer may ask to appear and speak at the hearing at your own cost, but you do not have to.

**For more information, call 1-866-557-1237 or visit [www.PrepaidCardDataBreachSettlement.com](http://www.PrepaidCardDataBreachSettlement.com).**

## **EXHIBIT D**

**NOTICE OF PROPOSED CLASS ACTION SETTLEMENT***In re Blackhawk Network Data Breach Litigation*, Case No. 22-cv-07084 (N.D. Cal.)

**You may be eligible for a cash payment from a class action settlement involving Blackhawk Network, Inc., but you need to act.**

*Si desea recibir esta notificación en español, llámenos o visite nuestra página web.*

**A court authorized this Notice.**

This is not spam, an advertisement, or a lawyer solicitation.

This is a court-authorized Notice of a proposed settlement in a class action lawsuit, *In re Blackhawk Network Data Breach Litigation*, Case No. 22-cv-07084, currently pending in the District Court for the Northern District of California. The proposed settlement would resolve a lawsuit that alleges that Blackhawk Network, Inc. d/b/a Blackhawk Engagement Solutions (“Blackhawk”) was negligent and breached contractual and statutory duties in connection with a Data Security Incident on MyPrepaidCenter.com that Blackhawk disclosed in October 2022. Blackhawk contests these claims and denies that it did anything wrong. This Notice explains the nature of the class action lawsuit, the terms of the settlement, and your legal rights and obligations.

You have legal rights and options that you may act on before the Court decides whether to approve the proposed settlement. Because your rights will be affected by this settlement, it is extremely important that you read this Notice carefully. To read the precise terms and conditions of the settlement, you can access a copy of the Settlement Agreement [here](#). You may also contact the Settlement Administrator at 1-866-557-1237.

<b>Summary of Your Legal Rights and Options in This Settlement</b>		<b>Deadline</b>
<b>Submit a Claim</b>	The only way to be eligible to receive a Claimant Award from this Settlement is by submitting a timely and valid Claim Form. The Claim Form must be submitted no later than <b>April 11, 2024</b> .	<b>April 11, 2024</b>
<b>Opt Out of the Settlement</b>	You can choose to opt out of the Settlement and receive no payment. This option allows you to sue, continue to sue, or be part of another lawsuit against the Defendant related to the legal claims resolved by this Settlement. You can elect your own legal counsel at your own expense.	<b>March 14, 2024</b>

**QUESTIONS? VISIT [WWW.PREPAIDCARDDEATABREACHSETTLEMENT.COM](http://WWW.PREPAIDCARDDEATABREACHSETTLEMENT.COM) OR  
CALL TOLL-FREE 1-866-557-1237**



<b>Object to the Settlement and/or Attend a Hearing</b>	If you do not opt out of the Settlement, you may object to it by writing to the Court explaining why you don't like the Settlement. You may also ask the Court for permission to speak about your objection at the Final Approval Hearing. If you object, you may also file a claim for a Claimant Award.	<b>March 14, 2024</b>
<b>Do Nothing</b>	Unless you opt out of the settlement, you are automatically part of the Settlement. If you do nothing, you will not receive a payment from this Settlement and you will give up the right to sue, continue to sue, or be part of another lawsuit against the Defendant related to the legal claims resolved by this Settlement.	No Deadline

### What Is This Lawsuit About?

In a class action, one or more people, called class representatives, sue on behalf of people who have similar claims. All of the people with similar claims are class members. One court resolves the issues for all class members, except those who exclude themselves from the class.

This lawsuit began when Plaintiffs Steven Pryor, Shane Scheib, Sabrina Singleton, Silvia Cortez, Brian O'Connor, and Kelly Rogers filed a consolidated putative class action complaint against Blackhawk. In the lawsuit, Plaintiffs allege that Blackhawk was negligent and violated contractual and statutory damages when a third party obtained unauthorized access to payment card information about certain prepaid cards being managed by users through MyPrepaidCenter.com. Blackhawk denies any liability or wrongdoing of any kind associated with the claims in this lawsuit.

This is just a summary of the allegations. The complaint in the lawsuit is posted at **[www.PrepaidCardDataBreachSettlement.com](http://www.PrepaidCardDataBreachSettlement.com)** and contains all of the allegations.

### Why Is There a Settlement?

To resolve this matter without the expense, delay, and uncertainties of litigation, the parties reached a settlement. The proposed settlement would require Blackhawk to pay money to the Settlement Class, and pay settlement administration costs, attorneys' fees and costs of Class Counsel, and a Service Payment to the Class Representatives, as may be approved by the Court. The settlement is not an admission of wrongdoing by Blackhawk and does not imply that there has been, or would be, any finding that Blackhawk violated the law.

**QUESTIONS? VISIT [WWW.PREPAIDCARDATABREACHSETTLEMENT.COM](http://WWW.PREPAIDCARDATABREACHSETTLEMENT.COM) OR  
CALL TOLL-FREE 1-866-557-1237**

### Am I a Class Member?

You are a member of the Settlement Class if you are a resident of the United States whose information was accessed in the Data Security Incident and you received notice of the Data Security Incident from Blackhawk.

### Who Represents Me?

The Court has appointed a team of lawyers as Class Counsel.

M. Anderson Berry Gregory Haroutunian	Terence R. Coates Justin C. Walker Dylan J. Gould	Marcus J. Bradley Kiley L. Grombacher Lirit A. King, Esq.	Scott Edward Cole Laura Van Note
CLAYEO C. ARNOLD, A PROFESSIONAL CORPORATION	MARKOVITS, STOCK & DEMARCO, LLC	BRADLEY/ GROMBACHER LLP	COLE & VAN NOTE
865 Howe Avenue Sacramento, CA 95825	119 East Court Street, Suite 530 Cincinnati, OH 45202	31365 Oak Crest Drive, Suite 240 Westlake Village, CA 91361	555 12 <sup>th</sup> Street, Suite 2100 Oakland, California 94607

Class Counsel will petition to be paid legal fees and to be reimbursed for their reasonable expenses from the Settlement Fund. You do not need to hire your own lawyer, but you may choose to do so at your own expense.

### What Are the Settlement Benefits?

Blackhawk has agreed to establish a Settlement Fund, by depositing with the Settlement Administrator US \$985,000.00 in cash.

The Settlement Fund will be used to pay attorneys' fees and costs, a Service Payment for the Class Representative and Settlement administration costs. After deducting amounts for attorneys' fees and costs, a Service Payment for the Class Representative, and Settlement administration costs, the remaining amount ("**Net Settlement Amount**") will be used to pay timely valid claims.

A Settlement Class Member who timely submits a valid and approved Claim Form shall be entitled to a Claimant Award: Out-of-Pocket Losses of up to \$5,000 may be awarded for any valid claim with proof of losses that are fairly traceable to the Data Security Incident and may be subject to *pro rata* reduction if insufficient funds remain. CCPA Payment will be awarded to any California Subclass Member in the amount of \$200 and may be *pro rata* decreased if insufficient funds remain. Pro rata cash payment will be determined based on the number of claims received and the amount of funds remaining in the Settlement Fund following the payment of any Attorneys' Fees

**QUESTIONS? VISIT [WWW.PREPAIDCARDDEATABREACHSETTLEMENT.COM](http://WWW.PREPAIDCARDDEATABREACHSETTLEMENT.COM) OR  
CALL TOLL-FREE 1-866-557-1237**

and Expenses Award, any Service Awards, the Costs of Claims Administration, claims for Out-of-Pocket Losses, and claims for CCPA Payments.

After payment of the above awards, if any money remains from the Net Settlement Amount, that money will be distributed pro rata among all Settlement Class Members who timely submitted a valid and approved Claim Form, or if too little money remains to make such a payment, the money will be donated to an appropriate charity.

Blackhawk has also agreed to certain enhancements to its data security.

### How Do I Get a Payment?

You must submit a completed Claim Form no later than **April 11, 2024**. You may submit a Claim Form online at [www.PrepaidCardDataBreachSettlement.com](http://www.PrepaidCardDataBreachSettlement.com).

### How Do I Exclude Myself from the Settlement?

If you want to exclude yourself from the Settlement Class, sometimes referred to as “opting out,” you will not be eligible to recover any benefits as a result of this settlement and you will not receive a payment or have any rights under the Settlement Agreement. However, you would keep the right to sue Blackhawk at your own expense about the legal issues raised in this lawsuit. You may exclude yourself from the settlement by mailing a written notice to the Settlement Administrator, postmarked on or before **March 14, 2024**. Your exclusion request letter must:

- Be in writing;
- State your current address;
- Contain the statement “I request that I be excluded from the Settlement Class in the case of *In re Blackhawk Network Data Breach Litigation*.”;
- Be signed by you; and
- Be mailed to the Settlement Administrator, **1650 Arch Street, Suite 2210, Philadelphia, PA, 19103**, postmarked on or before **March 14, 2024**.

### How Do I Object to the Settlement?

You can ask the Court to deny approval by filing an objection. You cannot ask the Court to order a different settlement; the Court can only approve or reject the settlement. If the Court denies approval, no settlement payments will be sent out, and the lawsuit will continue. If that is what you want to happen, you should object.

If you are a member of the Settlement Class and you do not exclude yourself from the Settlement, you can object to the Settlement. To do so, you must file your written objection with the Court no later than **March 14, 2024**, and mail a copy to Class Counsel and Blackhawk’s Counsel at the addresses listed below. Your written objection may include any supporting documentation you wish the Court to consider.

**QUESTIONS? VISIT [WWW.PREPAIDCARDATABREACHSETTLEMENT.COM](http://WWW.PREPAIDCARDATABREACHSETTLEMENT.COM) OR  
CALL TOLL-FREE 1-866-557-1237**

If your objection is submitted and overruled by the Court at the Final Approval hearing, you will remain fully bound by the terms of the Settlement Agreement and the Final Approval Order.

Mailing addresses for Class Counsel and Blackhawk's Counsel are as follows:

<b>CLASS COUNSEL:</b>	<b>BLACKHAWK'S COUNSEL:</b>
M. Anderson Berry Gregory Haroutunian CLAYEO C. ARNOLD, A PROFESSIONAL CORPORATION 865 Howe Avenue Sacramento, CA 95825	Aravind Swaminathan Caroline Simons Rebecca Harlow ORRICK HERRINGTON & SUTCLIFFE LLP 401 Union Street - Suite 3300 Seattle, WA 98101

#### **What Is the Difference Between Objecting and Asking to be Excluded?**

Objecting means telling the Court that you do not like something about the Settlement. You can object to the Settlement only if you stay in the Settlement Class. Excluding yourself is telling the Court that you do not want to be part of the Settlement. If you exclude yourself, you have no basis to object to the Settlement because it no longer affects you.

#### **What Am I Agreeing to by Remaining in the Settlement Class?**

Unless you exclude yourself, you will be part of the Settlement Class and you will be bound by the release of claims in the Settlement. This means that if the Settlement is approved, you cannot sue, continue to sue, or be part of any lawsuit against Blackhawk or the other Released Parties asserting a "Released Claim," as defined below. It also means that the Court's Order approving the settlement and the judgment in this case will apply to you and legally bind you.

**"Released Claims"** means any and all actual, potential, filed, unfiled, known or unknown, fixed or contingent, claimed or unclaimed, suspected or unsuspected, claims, demands, liabilities, rights, causes of action, damages, punitive, exemplary or multiplied damages, expenses, costs, attorneys' fees and/or obligations, whether in law or in equity, accrued or unaccrued, direct, individual or representative, of every nature and description whatsoever, whether based on federal, state, local, statutory or common law or any other law, against the Released Parties, or any of them, arising out of, or relating to, actual or alleged facts, transactions, events, matters, occurrences, acts, disclosures, statements, representations, omissions or failures to act in connection with the data security incident, and including all claims that were brought or could have been brought in the Action, belonging to any and all Settlement Class members, including but not limited to any state law or common law claims that they may have or had, such as under California's Customer Records Act, California Civil Code section 1798.80, et seq. and/or California's Consumer Privacy Act, California Civil Code section 1798.100, et seq. Each party expressly waives all rights under California Civil Code section 1542, which provides:

**QUESTIONS? VISIT [WWW.PREPAIDCARDDEBTBREACHSETTLEMENT.COM](http://WWW.PREPAIDCARDDEBTBREACHSETTLEMENT.COM) OR  
CALL TOLL-FREE 1-866-557-1237**

A GENERAL RELEASE DOES NOT EXTEND TO CLAIMS THAT THE CREDITOR OR RELEASING PARTY DOES NOT KNOW OR SUSPECT TO EXIST IN HIS OR HER FAVOR AT THE TIME OF EXECUTING THE RELEASE AND THAT, IF KNOWN BY HIM OR HER, WOULD HAVE MATERIALLY AFFECTED HIS OR HER SETTLEMENT WITH THE DEBTOR OR RELEASED PARTY.

“**Released Parties**” means Blackhawk and its past, present, and future, direct and indirect heirs, assigns, associates, corporations, investors, owners, parents, subsidiaries, affiliates, divisions, officers, directors, shareholders, agents, employees, attorneys, insurers, reinsurers, benefit plans, predecessors, successors, managers, administrators, executors and trustees.

#### **When Will the Court Decide Whether to Approve the Settlement?**

The Court will hold a Final Approval Hearing on **May 17, 2024 at 10:00 A.M. at San Francisco Courthouse, Courtroom 6 – 17<sup>th</sup> Floor, 450 Golden Gate Avenue, San Francisco, CA 94102**. At that hearing, the Court will determine the overall fairness of the settlement, hear objections, and decide whether to approve the requested attorneys’ fees and expenses, Service Payment for the Class Representatives, and settlement administration costs. The hearing may be moved to a different date or time without additional notice, so it is a good idea to check [www.PrepaidCardDataBreachSettlement.com](http://www.PrepaidCardDataBreachSettlement.com), and the Court’s docket for updates.

#### **How Do I Get More Information?**

For more information, go to **[www.PrepaidCardDataBreachSettlement.com](http://www.PrepaidCardDataBreachSettlement.com)**, or call the Settlement Administrator at **1-866-557-1237**. You may also write to the Settlement Administrator via mail to **Blackhawk Network Data Breach c/o Settlement Administrator, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103** or via email **[info@PrepaidCardDataBreachSettlement.com](mailto:info@PrepaidCardDataBreachSettlement.com)**.

**QUESTIONS? VISIT [WWW.PREPAIDCARDATABREACHSETTLEMENT.COM](http://WWW.PREPAIDCARDATABREACHSETTLEMENT.COM) OR  
CALL TOLL-FREE 1-866-557-1237**

## **EXHIBIT E**

**Your claim must be  
submitted online or  
postmarked by:  
April 11, 2024**

*In re Blackhawk Network Data Breach Litigation*

Case No. 22-cv-07084 (N.D. Cal.)

**BLA**

## **CLAIM FORM**

### **GENERAL INSTRUCTIONS**

This claim form should be filled out if you are an individual who received notice of a Data Security Incident that Blackhawk Network, Inc. d/b/a Blackhawk Engagement Solutions (“Blackhawk”) disclosed in October 2022 pertaining to unauthorized access to payment card information about certain prepaid cards being managed by users through MyPrepaidCenter.com. You may receive money if you fill out this claim form, if the Settlement is approved, and if you are found to be eligible for a payment.

The Settlement Notice available at [www.PrepaidCardDataBreachSettlement.com](http://www.PrepaidCardDataBreachSettlement.com) describes your legal rights and options.

If you wish to submit a claim for a Settlement payment, you need to provide the information requested below.

### **SUBMIT YOUR CLAIM FORM BY April 11, 2024**

Online: [www.PrepaidCardDataBreachSettlement.com](http://www.PrepaidCardDataBreachSettlement.com)

Mail: Blackhawk Data Breach Settlement,  
c/o Settlement Administrator  
1650 Arch Street, Suite 2210  
Philadelphia, PA 19103

**Your claim must be  
submitted online or  
postmarked by:  
April 11, 2024**

*In re Blackhawk Network Data Breach Litigation*

Case No. 22-cv-07084 (N.D. Cal.)

**BLA**

**CLAIM FORM**

**I. CLASS MEMBER NAME AND CONTACT INFORMATION**

Provide your name and contact information below. You must notify the Settlement Administrator if your contact information changes after you submit this Claim Form.

**First Name**

**Last Name**

**Street Address**

**City**

**State**

**Zip Code**

**Email Address**

**Telephone Number**

**Notice ID Number**

(provided on the Notice you received by email or mail)

**II. OUT-OF-POCKET LOSSES AND EXPENSE REIMBURSEMENT**

☐ Check this box if you are submitting a claim for reimbursement of out-of-pocket losses.

Allowable out-of-pocket expenses are detailed in the Settlement Agreement, available at [www.PrepaidCardDataBreachSettlement.com](http://www.PrepaidCardDataBreachSettlement.com) To receive up to **\$5,000.00** in reimbursement of out-of-pocket losses caused by, or expenses incurred as a result of, the Data Security Incident, please provide the following information:

Amount Requested: \$ \_\_\_\_\_.

Please briefly describe the out-of-pocket expenses and how they relate to the Data Security Incident:

<i>Description of Expense</i>	<i>Amount</i>
<i>Example: Receipt for credit repair services</i>	<i>\$100</i>



Your claim must be  
submitted online or  
postmarked by:  
April 11, 2024

*In re Blackhawk Network Data Breach Litigation*

Case No. 22-cv-07084 (N.D. Cal.)

BLA

## CLAIM FORM

Documentary proof **MUST** be submitted to support your exact claim amount. "Self-prepared" documents are, by themselves, insufficient.

### III. PRO RATA CASH PAYMENT

All Class Members are eligible to claim a Pro Rata payment by checking the box below. The specific amount of this payment will be based on the number of claims received.

☐ I would like to claim a Pro Rata payment.

### IV. CASH PAYMENT UNDER THE CALIFORNIA CONSUMER PRIVACY ACT (CCPA)

**CALIFORNIA RESIDENTS ONLY.** If you were a resident of California between September 4, 2022, and September 11, 2022, you may submit a claim for a payment of up to \$200 under the CCPA by checking the box below. The specific amount of this payment will be based on the number of claims received.

☐ I was a California resident between September 4, 2022, and September 11, 2022, and would like to claim a payment under the CCPA of up to \$200.

### V. PAYMENT SELECTION

Please select from **one** of the following payment options:

☐ **PayPal** - Enter your PayPal email address: \_\_\_\_\_

☐ **Venmo** - Enter the mobile number associated with your Venmo account: \_\_\_\_-\_\_\_\_-\_\_\_\_

☐ **Zelle** - Enter the mobile number or email address associated with your Zelle account:

Mobile Number: \_\_\_\_-\_\_\_\_-\_\_\_\_ or Email Address: \_\_\_\_\_

☐ **Physical Check** - Payment will be mailed to the address provided in Section I above.

### VI. SIGNATURE

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Date

## **EXHIBIT F**

Blackhawk Network Data Breach Litigation – Exclusion Breakdown

Notice ID	Full Name	Date Received
BHN169886	Tracy Pedrotti	2/9/2024
BHN158651	Kirstin Gamboa	1/30/2024
BHN130748	Duane Carey	1/24/2024